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Attorneys for Defendant
MODEL N, INC., a Delaware Corporation

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JEREMY GORDON, AN INDIVIDUAL;

Plaintiff,

vs.

MODEL N, INC. , A DELAWARE
CORPORATION;

Defendant.

Case No.: 3:15-cv-01423-WHA

**~~[PROPOSED]~~ ORDER AND STIPULATION
TO CONTINUE FILING DEADLINE OF
PRETRIAL DOCUMENTS**

Filing Date: 3/27/15

Trial Date: 7/11/16

RECITALS

WHEREAS, on April 28, 2016, both Parties filed Cross-Motions For Summary Judgment.
[Dkt # 35 and 36.]

WHEREAS, the hearing on the Parties' cross-motions was set for June 2, 2016. [Dkt #41.]

1 WHEREAS, on May 27, 2016, the Court rescheduled the hearing on the cross-motions for
2 summary judgment to June 9, 2016 [Dkt #52.]

3 WHEREAS, this case is currently set for Pretrial Conference on June 15, 2016 pursuant to
4 this Court's Case Management Order. [Dkt. #24.].

5 WHEREAS, pursuant to this Court's Guidelines for Trial and Final Pretrial Conference in
6 Civil Jury Cases before the Honorable William Alsup, orders the parties to file the following at
7 least seven calendar days in advance of the final pretrial conference

- 8 - Joint proposed final pretrial order
- 9 - Joint set of proposed instructions
- 10 - Separate memorandum of law in support of each party's disputed instruction
- 11 - Joint special verdict form
- 12 - Joint set of proposed voir dire questions.

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14 WHEREAS, pursuant to this Court's Guidelines for Trial and Final Pretrial Conference, the
15 pretrial filings are due on June 8, 2016, the day before the scheduled hearing on the cross-motions
16 for summary judgment.

17 WHEREAS, in accordance with the Court's guidelines the parties have been meeting and
18 conferring on pretrial documents.

19 WHEREAS, the Court's ruling of the cross-motions for summary judgment could have a
20 significant impact on the substance of the parties' joint pretrial documents and their subsequent
21 pretrial briefs.

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STIPULATION

NOW THEREFORE, it is hereby stipulated and agreed by Plaintiff, on the one hand, and Defendant, on the other hand, by and through their respective undersigned counsel of records, that this Court enter an order continuing the deadline of the pretrial documents filing date until Monday, June 13, 2016 to allow the parties to narrow the issues pursuant to this Court's Order on the cross-motions for summary judgment.

As counsel for Plaintiff Jeremy Gordon, I certify that I have obtained the concurrence of Megan Ottoboni as counsel for Defendant, for the filing of this stipulation.

DATED: June 8, 2016

LAW OFFICES OF MICHAEL TRACY

/s/ Michael Tracy

By:

MICHAEL TRACY, Attorney for Plaintiff
Jeremy Gordon

DATED: June 8, 2016

/s/ Megan Ottoboni

ROBERT J. WILGER
MEGAN E. OTTOBONI
LITTLER MENDELSON, P.C.
Attorneys for Defendant
MODEL N, INC., A DELAWARE
CORPORATION

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.


HON. WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE